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Attorney for Defendant
HUGO RAMIREZ

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

HUGO RAMIREZ, et al.

Defendants.

No. Cr. S-05-0090 WBS

STIPULATED HEARING DATE
AND [PROPOSED] ORDER AND
EXCLUSION OF TIME

The United States of America, through Assistant U.S. Attorney Matthew D. Segal, defendant Hugo Ramirez, through his counsel Scott L. Tedmon, and defendant Jayson Edwards, through his counsel Rachelle Barbour, hereby stipulate that the February 2, 2006 non-evidentiary motions hearing date be continued to February 23, 2006 at 2:00 p.m. Counsel for defendant Ramirez begins a state court jury trial on February 1, 2006 and will not be able to appear on February 2, 2006.

If necessary, any subsequent evidentiary hearing date shall be set at the February 23, 2006 court appearance. Sally Hoover has approved this date. No trial date has been set in this case.

SPEEDY TRIAL ACT - EXCLUSION OF TIME

The parties stipulate that time should be excluded through February 23, 2006 under the Speedy Trial Act based on the needs of counsel to prepare as well as continuity of counsel. 18 U.S.C. §3161(h)(8)(B)(iv); Local Code T4. Additionally, time is excluded on the basis that motions are pending. 18 U.S.C. §3161(h)(1)(F); Local Code E. The parties stipulate and agree that the interests of justice served by granting this continuance outweigh the best interests of the public and

1 the defendant in a speedy trial. 18 U.S.C. § 3161(h)(8)(A).

2 Finally, Scott L. Tedmon has been authorized by all counsel to sign this stipulation on their
3 behalf.

4 **IT IS SO STIPULATED.**

5 DATED: January 26, 2006

McGREGOR W. SCOTT
United States Attorney

6
7 /s/ Matthew D. Segal
MATTHEW D. SEGAL
Assistant U.S. Attorney

8 DATED: January 26, 2006

LAW OFFICES OF SCOTT L. TEDMON

9
10 /s/ Scott L. Tedmon
SCOTT L. TEDMON
Attorney for Hugo Ramirez

11 DATED: January 26, 2006

FEDERAL DEFENDER'S OFFICE

12
13 /s/ Rachelle Barbour
RACHELLE BARBOUR
Attorney for Jayson Edwards

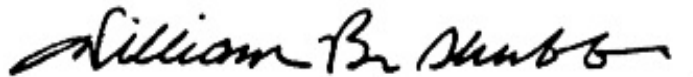
ORDER

GOOD CAUSE APPEARING and based upon the above stipulation, IT IS HEREBY ORDERED that the non-evidentiary hearing date on defense motions is set for Thursday, February 23, 2006 at 2:00 p.m.

Based upon the above stipulation, IT IS FURTHER ORDERED that time be excluded under the Speedy Trial Act for needs of counsel to prepare and continuity of counsel pursuant to 18 U.S.C. §3161(h)(8)(B)(iv), Local Code T4, and pending motions pursuant to 18 U.S.C. §3161(h)(1)(F), Local Code E, through February 23, 2006, the date of the hearing on the motions. The Court finds that the interests of justice served by granting this continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(8)(A).

IT IS SO ORDERED.

DATED: January 26, 2006



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE